

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
	:	
IN RE: COMBINED WORLD TRADE CENTER	:	21 MC 103 (AKH)
AND LOWER MANHATTAN DISASTER SITE	:	
LITIGATION (STRADDLER PLAINTIFFS)	:	
-----	X	
	:	
PEDRO TORRES,	:	08-CV-2310 (AKH)
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
ON-SITE:	:	
7 WORLD TRADE COMPANY, L.P.; A RUSSO	:	FGP 90 WEST STREET,
WRECKING, INC.; ABM INDUSTRIES, INC.; ABM	:	INC.'S NOTICE OF
JANITORIAL NORTHEAST, INC.; AMEC	:	ADOPTION OF ANSWER TO
CONSTRUCTION MANAGEMENT, INC.; AMEC	:	MASTER COMPLAINT
EARTH & ENVIRONMENTAL, INC.; ANTHONY	:	
CORTESE SPECIALIZED HAULING LLC.;	:	
ATLANTIC HEYDT CORP.; BECHTEL	:	
ASSOCIATES PROFESSIONAL CORPORATION;	:	
BECHTEL CONSTRUCTION, INC.; BECHTEL	:	
CORPORATION; BECHTEL ENVIRONMENTAL,	:	
INC.; BERKEL & COMPANY, CONTRACTORS,	:	
INC.; BIG APPLE WRECKING & CONSTRUCTION	:	
CORP; BOVIS LEND LEASE LMB, INC.; BREEZE	:	
CARTING CORP.; BREEZE NATIONAL INC.;	:	
BRER-FOUR TRANSPORTATION CORP.; BURO	:	
HAPPOLD CONSULTING ENGINEERS, P.C.; C B	:	
CONTRACTING CORP; CANRON	:	
CONSTRUCTION CORP.; CORD CONTRACTING	:	
CO., INC.; DAKOTA DEMO-TECH; DIAMOND	:	
POINT EXCAVATING CORP ; DIEGO	:	
CONSTRUCTION, INC; DIVERSIFIED CARTING,	:	
INC., DMT ENTERPRISE INC.; D'ONOFRIO	:	
GENERAL CONTRACTORS CORP.; EAGLE	:	
LEASING & INDUSTRIAL SUPPLY, INC.; EAGLE	:	
ONE ROOFING CONTRACTORS INC; EJ DAVIES,	:	
INC.; EN-TECH CORP.; EVERGREEN	:	
RECYCLING OF CORONA(EROC); EWELL W.	:	
FINLEY, P.C., EXECUTIVE MEDICAL SERVICES,	:	
P.C.; FLEET TRUCKING, INC.; FRANCIS A. LEE	:	

EXTERIOR RESTORATION, INC.; FTI TRUCKING, :
 INC.; GILSANZ, MURRAY, & STEFICEK, LLP, :
 GOLDSTEIN ASSOCIATES CONSULTING :
 ENGINEERS, PLLC.; HALLEN WELDING :
 SERVICE, INC.; H.P. ENVIRONMENTAL; KOCH :
 SKANSKA INC; LAQUILA CONSTRUCTION INC.; :
 LASTRADA GENERAL CONTRACTING CORP.; :
 LESLIE E. ROBERTSON ASSOCIATES :
 CONSULTING ENGINEERS P.C.; LIBERTY :
 MUTUAL GROUP; LOCKWOOD, KESSLER & :
 BARTLETT, INC.; LUCIUS PITKIN, INC.; LZA :
 TECH-DIV OF THORTON TOMASETTI; :
 MANAFORT BROTHERS INCORPORATED; :
 MAZZOCCHI WRECKING, INC.; HUDSON :
 MERIDIAN CONSTRUCTION GROUP, LLC F/K/A :
 MERIDIAN CONSTRUCTION CORP.; :
 MORETRENCH AMERICAN CORP.; MRA :
 ENGINEERING, PC; MUESER RUTLEDGE :
 CONSULTING ENGINEERS, INC; NACIREMA :
 INDUSTRIES INCORPORATED; NEW YORK :
 CRANE & EQUIPMENT CORP.; NICHOLSON :
 CONSTRUCTION COMPANY; PETER :
 SCALAMANDRE & SONS, INC.; PINNACLE :
 ENVIRONMENTAL CORP.; PLAZA :
 CONSTRUCTION CORP.; PRO SAFETY SERVICES :
 LLC.; PT & L CONTRACTING CORP.; ROBER :
 SILMAN ASSOCIATES; ROBERT L. GEROSA, :
 INC.; RODAR ENTERPRISES, INC.; ROYAL GM, :
 INC; SAB TRUCKING INC.; SAFEWAY :
 ENVIRONMENTAL CORP.; SEASONS :
 INDUSTRIAL CONTRACTING; SEMCOR :
 EQUIPMENT & MANUFACTURING CORP.; :
 SILVERITE CONTRACTING CORPORATION; :
 SIMPSON GUMPERTZ & HEGER INC.; :
 SKIDMORE, OWING & MERRILL LLP; :
 SURVIVAIR; TISHMAN CONSTRUCTION :
 CORPORATION OF MANHATTAN; TISHMAN :
 CONSTRUCTION CORPORATION OF NEW :
 YORK; TISHMAN INTERIORS CORPORATION; :
 TISHMAN SPEYER PROPERTIES; THORTON- :
 TOMASETTI GROUP, INC.; TORRETTA :
 TRUCKING, INC.; TOTAL SAFETY :
 CONSULTING, L.L.C.; TUCCI EQUIPMENT :
 RENTAL CORP.; TULLY CONSTRUCTION CO., :
 INC.; TURNER CONSTRUCTION COMPANY; :
 ULTIMATE DEMOLITION/CS HAULING (JOINT :

VENTURE); VOLLMER ASSOCIATES LLP.; :
 WEEKS MARINE, INC.; WEIDLINGER :
 ASSOCIATES, CONSULTING ENGINEERS, P.C.; :
 WHITNEY CONTRACTING INC.; WOLKOW- :
 BRAKER ROOFING CORP.; WORLD TRADE :
 CENTER PROPERTIES LLC.; WSP CANTOR :
 SEINUK; YANNUZZI & SONS, INC; YONKERS :
 CONTRACTING COMPANY, INC.; YORK :
 HUNTER CONSTRUCTION, LLC; ZIEGENFUSS :
 DRILLING, INC.; :
 OFF-SITE: :
 150 BROADWAY CORP., 150 BROADWAY N.Y. :
 ASSOCS. L.P.; 90 CHURCH STREET LIMITED :
 PARTNERSHIP, ALAN KASMAN DDBA KASCO; :
 AMBIENT GROUP, INC.; ANN TAYLOR STORES :
 CORPORATION; AT&T WIRELESS SERVICES, :
 INC.; BAILEY N.Y. ASSOCIATES, BANKERS :
 TRUST COMPANY; BATTERY PARK CITY :
 AUTHORITY; BELFOR USA GROUP, INC.; BFP :
 ONE LIBERTY PLAZA CO., LLC; BLACKMON- :
 MOORING-STEAMATIC CATASTROPHE , INC. :
 D/B/A BMS CAT; BOARD OF EDUCATION OF :
 THE CITY OF NEW YORK; BOSTON :
 PROPERTIES, INC.; BROOKFIELD FINANCIAL :
 PROPERTIES, INC.; BROOKFIELD FINANCIAL :
 PROPERTIES, LP.; BROOKFIELD PARTNERS , LP; :
 BROOKFIELD PROPERTIES CORPORATION; :
 BROOKFIELD PROPERTIES HOLDINGS INC.; BT :
 PRIVATE CLIENTS CORP; DEPARTMENT OF :
 BUSINESS SERVICES; DEUTSCHE BANK TRUST :
 COMPANY, DEUTSCHE BANK TRUST :
 COMPANY AMERICAS, DEUTSCHE BANK :
 TRUST CORPORATION; FGP 90 WEST STREET :
 INC.; GENERAL RE SERVICES CORP.; GPS :
 ENVIRONMENTAL CONSULTANTS, INC; :
 HILLMAN ENVIRONMENTAL GROUP, LLC; :
 INDOOR ENVIRONMENTAL TECHNOLOGY, :
 INC.; KASCO RESTORATION SERVICES CO.; :
 KIBEL COMPANIES; MERRILL LYNCH &CO, :
 INC.; NATIONAL ASSOCIATION OF SECURITIES :
 DEALERS, INC.; NEW LIBERTY PLAZA LP; NEW :
 YORK CITY INDUSTRIAL DEVELOPMENT :
 AGENCY, NEW YORK CITY INDUSTRIAL :
 DEVELOPMENT CORPORATION; NEW YORK :
 CITY SCHOOL CONSTRUCTION AUTHORITY, :
 NOMURA HOLDING AMERICA, INC.; NOMURA :

SECURITIES INTERNATIONAL, INC.; ONE :
 LIBERTY PLAZA; STRUCTURE TONE (UK), INC.; :
 STRUCTURE TONE GLOBAL SERVICES, INC.; :
 THE BANK OF NEW YORK TRUST COMPANY :
 NA; THE BOARD OF MANAGERS OF THE ONE :
 LIBERTY PLAZA CONDOMINIUM (CONDO :
 #1178); THE ONE LIBERTY PLAZA :
 CONDOMINIUM (CONDO #1178); TISHMAN :
 INTERIORS CORPORATION; TOSCORP INC; :
 TRIBECA LANDING L.L.C.; TUCKER ANTHONY, :
 INC.; TULLY CONSTRUCTION CO., INC.; TULLY :
 INDUSTRIES, INC.; WESTON SOLUTIONS, INC.; :
 WFP ONE LIBERTY PLAZA CO., L.P.; WFP ONE :
 LIBERTY PLAZA CO. GP, CORP., WFP TOWER A :
 CO.; WFP TOWER A CO. G.P. CORP.; WFP :
 TOWER A CO., L.P.; WFP TOWER B CO. G.P. :
 CORP.; WFP TOWER B HOLDING CO., LP; WFP :
 TOWER B CO., L.P.; WFP TOWER D CO. G.P. :
 CORP.; WFP TOWER D HOLDING CO. I L.P.; WFP :
 TOWER D HOLDING CO. II L.P.; WFP TOWER D :
 HOLDING I G.P. CORP.; WFP TOWER D CO., L.P.; :
 and WORLD FINANCIAL PROPERTIES, L.P. ET :
 AL; :

Defendants. :

X

PLEASE TAKE NOTICE THAT Defendant FGP 90 West Street, Inc., by its attorneys, DLA Piper US LLP, as and for its responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the matter captioned *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH), hereby adopts FGP 90 West Street, Inc.'s Answer to Master Complaint dated August 3, 2007, which was filed in that matter. To the extent that FGP 90 West Street, Inc.'s Answer to the Master Complaint does not comprehensively address any of the allegations set forth in the Check-Off Complaint filed in the above-captioned matter, FGP 90 West Street, Inc. denies knowledge or information sufficient to form a belief as to the truth of such allegations.

WHEREFORE, FGP 90 West Street, Inc. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York.
May 30, 2008

By: s/ Keara M. Gordon
Keara M. Gordon (KMG 2323)
Michael D. Hynes (MH 5086)
DLA PIPER US LLP
1251 Avenue of the Americas
New York, New York 10020-1104
Phone: (212) 335-4500
Facsimile: (212) 335-4501

Robert J. Mathias (admitted *pro hac vice*)
The Marbury Building
6225 Smith Avenue
Baltimore, MD 21209-3600
Phone: (410) 580-3000
Fax: (410) 580-3001

*Attorneys for Defendant
FGP 90 West Street, Inc.*